

1 MICHAEL D. YOUNG (SBN 120787)
2 NICOLE C. RIVAS (SBN 179337)
3 **ALSTON & BIRD LLP**
4 333 South Hope Street, Sixteenth Floor
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7 Facsimile: (213) 576-1100
8 Email: mike.young@alston.com
9 nicole.rivas@alston.com

10 Attorneys for Defendant THE BOARD OF TRUSTEES
11 OF THE UNIVERSITY OF ILLINOIS, erroneously sued as
12 THE UNIVERSITY OF ILLINOIS-URBANA CHAMPAIGN

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

15 ST. LUKE SCHOOL OF MEDICINE;
16 DR. JERROLL B.R. DOLPHIN and
17 DR. ROBERT FARMER on behalf of
18 himself and all others similarly situated, as
19 applicable,

20 Plaintiffs,

21 v.

22 REPUBLIC OF LIBERIA; MINISTRY OF
23 HEALTH, a Liberian Governmental
24 Agency; MINISTRY OF EDUCATION, a
25 Liberian Governmental Agency; LIBERIAN
26 MEDICAL BOARD, a Liberian
27 Governmental Agency; NATIONAL
28 COMMISSION ON HIGHER
EDUCATION, a Liberian Governmental
Agency; NATIONAL TRANSITIONAL
LEGISLATIVE ASSEMBLY, a Liberian
Governmental Agency; DR. ISAAC
ROLAND; MOHAMMED SHERIFF; DR.
BENSON BARH; DR. GEORGE GOLLIN;
EDUCATION COMMISSION FOR
FOREIGN MEDICAL GRADUATES; a
Pennsylvania Non-Profit organization;
FOUNDATION FOR ADVANCEMENT
OF INTERNATIONAL EDUCATION
AND RESEARCH; a Pennsylvania Non-
Profit organization, UNIVERSITY OF
ILLINOIS-URBANA CHAMPAIGN, an
Illinois Institution of Higher Learning;
STATE OF OREGON, Office of Degree
Authorization,

Defendants.

Case No.: 10-CV-01791 RGK (SHx)

[Honorable R. Gary Klausner]

**DECLARATION OF MICHAEL D.
YOUNG IN SUPPORT OF
DEFENDANTS DR. GEORGE
GOLLIN'S AND THE BOARD OF
TRUSTEES OF THE UNIVERSITY
OF ILLINOIS' MOTION FOR
COSTS PURSUANT TO 28 U.S.C. §
1919**

**[FILED CONCURRENTLY WITH
DEFENDANTS DR. GEORGE
GOLLIN'S AND THE BOARD OF
TRUSTEES OF THE UNIVERSITY
OF ILLINOIS' NOTICE OF
MOTION AND MOTION FOR
COSTS PURSUANT TO 28 U.S.C. §
1919; MEMORANDUM OF POINTS
AND AUTHORITIES; AND
[PROPOSED] ORDER]**

DATE: September 28, 2010
TIME: 9:00 a.m.
COURTROOM: 850

DECLARATION OF MICHAEL D. YOUNG

I, Michael D. Young, declare and state as follows:

1. I am an attorney duly licensed to practice law before all courts of the State of California and am a partner with the law firm of Alston & Bird LLP, attorneys of record for defendants "The Board of Trustees of the University of Illinois" and Dr. George Gollin, herein. I have personal knowledge of the files and records in this action, and of the facts set forth in this declaration. I could and would competently testify to the matters set forth herein.

2. Upon my review of the Complaint and Amended Complaint in this action, it appeared to me that among the many infirmities with the complaint, both procedurally and legally, there were significant jurisdictional hurdles that I did not think the plaintiffs could overcome. Among them were Eleventh Amendment sovereign immunity issues that appeared to bar the claims against our clients in this action as a matter of law.

3. Because it seemed so inefficient and expensive to have to utilize the Court and its resources to address these issues, and in the hopes that we could convince the plaintiffs to dismiss the action as to our clients, I telephoned plaintiffs' counsel, Thaddeus J. Culpepper, on or about May 10, 2010, to discuss the case and our concerns. In that conversation (which turned out to be the only telephone conversation I was ever able to have with Mr. Culpepper), I notified Mr. Culpepper that plaintiffs' claims were improper in light of the sovereign immunity protection of the Eleventh Amendment to the U.S. Constitution. Telling Mr. Culpepper I would follow up our call with a letter, I asked him in particular to voluntarily dismiss my clients from the action. Attached hereto as **Exhibit A** is a true and correct copy of my confirming email to Mr. Culpepper.

4. On or about May 13, 2010, I sent Mr. Culpepper the promised letter detailing the case law that confirms that this action is inappropriate as against the University of Illinois in light of its Eleventh Amendment protection (at the time,

1 defendant Gollin had not yet been served). In that letter, I urged Mr. Culpepper to
2 dismiss the University so that we would not need to file a motion to dismiss. *I also*
3 *notified him that I thought Rule 11 and other sanctions would be appropriate if he*
4 *failed to dismiss in light of the uncontroverted authority prohibiting this action*
5 *against the University.* Attached hereto as **Exhibit B** is a true and correct copy of our
6 May 13, 2010, letter to Mr. Culpepper, which was delivered both by email and
7 U.S. Mail.

8 5. I never received a response from Mr. Culpepper. Accordingly, on
9 May 20, 2010, I telephoned Mr. Culpepper to discuss my letter and our request for a
10 voluntary dismissal. Mr. Culpepper did not have anyone answering his telephone, so I
11 left him a voicemail message asking him to call me. I followed this up with an email
12 also requesting that he give me a call or at least indicate whether he would dismiss the
13 University. Attached hereto as **Exhibit C** is a true and correct copy of my May 20,
14 2010, email to Mr. Culpepper.

15 6. Because Mr. Culpepper again never returned my phone call or
16 email, I tried one more time to contact Mr. Culpepper. At my direction, my colleague
17 Nicole Rivas telephoned Mr. Culpepper on May 26, 2010, but was unable to reach
18 him. She followed up that call with an email to Mr. Culpepper in which she again
19 sought a dismissal on sovereign immunity grounds, or alternatively asked for any
20 authority plaintiff might have to support a claim against an Illinois public university in
21 federal court here in California. *She also again put Mr. Culpepper on notice that if*
22 *forced to bring a motion to dismiss, we would seek sanctions against him and his*
23 *client as provided by law.* Attached hereto as **Exhibit D** is a true and correct copy of
24 Ms. Rivas' May 26, 2010 email to Mr. Culpepper.

25 7. Mr. Culpepper ignored this communication as well. Indeed, except
26 for the first call I had with him on May 10, 2010, Mr. Culpepper has completely
27 ignored all of my efforts to contact him regarding this case. In light of Mr.
28 Culpepper's silence, we had no choice but to file our motion to dismiss.

1 8. Surprisingly, on or about June 1, 2010, the day we filed our motion
2 to dismiss on behalf of the University, at nearly 4:00 p.m., I received an email from
3 Mr. Culpepper replying to my email of May 20, 2010. His email stated merely: "We
4 will be voluntarily dismissing." A true and correct copy of this email is attached
5 hereto as **Exhibit E**. Mr. Culpepper has never since responded to any of our
6 communications requesting that he provide the promised dismissal, nor have plaintiffs
7 ever made any attempt to voluntarily dismiss their claims against our clients.

8 9. After filing the motion to dismiss on behalf of the University, I
9 learned that plaintiffs had sought to serve process on our other client, University of
10 Illinois professor Dr. George Gollin, a named defendant in this action. On or about
11 June 10, 2010, I again tried to reach Mr. Culpepper by telephone, and because he has
12 no one answering his telephones, I was forced to leave another message in his
13 voicemail. I asked that he dismiss Professor Gollin under the Eleventh Amendment,
14 and offered to send him authorities to support the dismissal. I followed up my
15 telephone call with an email to Mr. Culpepper summarizing my voicemail message
16 and asking that he call me back. Attached hereto as **Exhibit F** is a true and correct
17 copy of my June 10, 2010 email to Mr. Culpepper.

18 10. Consistent with prior experience, Mr. Culpepper never replied to
19 any of my calls or emails. Indeed, other than the five word message in Exhibit E (and
20 the initial phone call on May 10), I received no communication from Mr. Culpepper
21 and was never able to hold a discussion with him regarding any aspect of this case.
22 Accordingly, we were forced to prepare and file a motion to dismiss as to Professor
23 Gollin.

24 11. In the meantime, as this Court is surely aware from a glance at its
25 docket, we received numerous subsequent pleadings and filings from plaintiff Dolphin
26 directly, as well as from Mr. Culpepper, which required our attention; and while this
27 Court eventually, and properly, rejected most of these filings, we were still required to
28 review and monitor them, and consider with our clients whether responses were

1 necessary.

2 12. Had Mr. Culpepper responded to our initial efforts to discuss this
3 case with him, our clients would have been spared considerable attorneys' fees and
4 costs. Clearly, judging by Mr. Culpepper's written agreement to dismiss the
5 University from this action, plaintiffs recognized the lawsuit was not well taken as to
6 our clients. Our clients never should have been named in the first place; but, at a
7 minimum, after we had provided plaintiffs with the legal authority confirming the
8 impropriety of the action as against our clients, they should have been dismissed
9 immediately. Plaintiffs were on notice that by refusing to dismiss our clients from this
10 action, we would seek appropriate sanctions.

11 13. As this Court is aware, it dismissed this action in its entirety on
12 jurisdictional grounds on July 29, 2010. For the Court's convenience, a true and
13 correct copy of this order is attached hereto as **Exhibit G**.

14 14. I have reviewed our invoices and other billing records for this
15 action. The following *costs* were incurred by us and billed to our clients as a direct
16 result of either our attempt to either procure a voluntary dismissal of this action or our
17 filing of the two motions to dismiss once it became clear that no voluntary dismissal
18 would be forthcoming:

- 19 a. Postage for mailing documents to plaintiff's counsel: **\$7.17;**
- 20 b. Photocopies of documents either filed with the Court
21 directly, mailed to opposing counsel or used internally for analyzing the grounds for
22 and/or preparing motions to dismiss: **\$72.53;**
- 23 c. Computer costs for legal research (Lexis and Westlaw):
24 **\$922.27;**
- 25 d. Courier services for providing courtesy copies of filings to
26 the Court's chambers, as requested by the Court: **\$105.50;**
- 27 e. **TOTAL: \$1,107.47**
- 28

1 True and correct copies of the documentation supporting such costs, including invoices
2 were available, are attached hereto as **Exhibit H**.

3 15. We submit that these costs are more than reasonable for this action.
4 With respect to the computer costs for legal research noted above, it is my
5 understanding of the prevailing practice in the community – which is based on
6 25 years of working as an attorney in Los Angeles, California, for countless clients,
7 including large clients with their own billing guidelines and requirements – that
8 computer costs for legal research are regularly billed to clients as a separate cost item.
9 In fact, I am not aware of a single one of our clients for whom we do not separately
10 charge computer costs for legal research as a cost item. And, indeed, in this case, as
11 with all of our clients, defendants were charged separately for all computer research as
12 a separate cost item.

13 16. The computer research costs identified above are also more than
14 reasonable for the legal research necessary to defend our clients in this case. These
15 costs were associated with research that was necessary both to understand the action
16 and develop a defensive strategy, as well as to draft the two motions to dismiss. The
17 research can be roughly categorized into the following topics: The various causes of
18 action asserted in the complaint and defenses thereto; 11th Amendment/sovereign
19 immunity issues, and their application to a public university and employee; FRCP
20 Rules 8, 12, 23, and 41 issues; and certain procedural issues that arose from the
21 plaintiffs' unusual filing activities.

22 17. Pursuant to Local Rule 7-3, my colleague Nicole Rivas called Mr.
23 Culpepper on Friday, August 6, 2010, to discuss the substance of this motion, and the
24 concurrently filed motion for sanctions. Ms. Rivas informed me that she left a
25 message on Mr. Culpepper's voicemail setting forth the nature of the call, describing
26 our intent to file these motions, and requesting a call back. Having heard nothing
27 from him, Ms. Rivas called Mr. Culpepper again on Wednesday, August 11, 2010,
28 and left a similar message. She followed that up with an email, on which I was

1 copied. A true and correct copy of that email is attached hereto as **Exhibit I**.

2 I declare under penalty of perjury under the laws of the United States and
3 the State of California that the foregoing is true and correct of my personal
4 knowledge.

5 Executed on this 12th day of August, 2010, at L. Angeles, California.

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8 Michael D. Young
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EXHIBIT A

Olaques, Laura

From: Young, Mike
Sent: Monday, May 10, 2010 1:16 PM
To: 'thaddeusfsc@gmail.com'; 'culpepper@alumni.pitt.edu'
Subject: St. Luke School of Medicine v. Republic of Liberia

Thaddeus, thank you for speaking with me today. As I mentioned, we represent the University of Illinois in the captioned matter. This will confirm our agreement today that rather than dispute the effectiveness of service of process over the University of Illinois, the University has agreed to accept service with the understanding that the University's last day to respond to the complaint is 21 days from today, or June 1, 2010 (21 days from today is May 31, but that's a Memorial Day holiday, so we moved the deadline one day further).

As we discussed, I will send you a letter shortly formally requesting your clients to dismiss the University of Illinois on sovereign immunity grounds, among others.

Please feel free to call if you would like to discuss this.

Regards,

-MIKE-

Michael D. Young

Alston + Bird

333 S. Hope Street, 16th Floor

Los Angeles, CA 90071

Direct: (213) 576-1135

Office: (213) 576-1000

mike.young@alston.com

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<http://www.alston.com/laborandemploymentblog>

EXHIBIT B

Olagues, Laura

From: Olagues, Laura
Sent: Thursday, May 13, 2010 5:36 PM
To: thaddeusfsc@gmail.com; culpepper@alumni.pitt.edu
Cc: Young, Mike
Subject: St. Luke School of Medicine v. Republic of Liberia, et al.

Attachments: 5-13-10 Ltr to Atty. Culpepper.pdf

Dear Mr. Culpepper,

Attached please find a PDF copy of Mr. Young's letter of this date regarding the above referenced matter.

Please feel free to email or call me if I may be of further assistance.

Very truly yours,

Laura Olagues, Assistant to
Michael D. Young
Alston & Bird LLP
333 South Hope Street, Sixteenth Floor
Los Angeles, California 90071
Direct: (213) 576-1151
Facsimile: (213) 576-1100
Email: laura.olagues@alston.com



5-13-10 Ltr to Atty.
Culpepper...

ALSTON & BIRD LLP

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16th Floor
Los Angeles, CA 90071-1410

213-576-1000
Fax: 213-576-1100
www.alston.com

Michael D. Young
Email: mike.young@alston.com

VIA UPS AND EMAIL
thaddeusfsc@gmail.com
culpepper@alumni.pitt.edu

May 13, 2010

Thaddeus J. Culpepper
Culpepper Law Groupe
556 South Fair Oaks Avenue
Suite 101 - No. 302
Pasadena, California 91105

Re: St. Luke School of Medicine, et al., v. Republic of Liberia, et al.
United States District Court Case No. CV-10-1791 RGK (SHx)

Dear Mr. Culpepper:

Please accept this as our formal request that you immediately dismiss the University of Illinois from the referenced action.

As I mentioned in our phone call this week, it is without exception that the principle of sovereign immunity unconditionally bars this action as against the University of Illinois. I would urge you to take a look at *Regents of the University of California v. John Doe*, 519 U.S. 425, 429 (1996), and *Eaglesmith v. Ward*, 73 F.3d 857, 859-860 (9th Cir. 1995), where the U.S. Supreme Court and the Ninth Circuit both confirmed that states are immune from private damages actions in federal court under the Eleventh Amendment to the U.S. Constitution.

As those courts remind us, the Eleventh Amendment provides in pertinent part that the "judicial power of the United States shall *not* be construed to extend to any suit in law or equity . . . *against one of the United States by Citizens*

Thaddeus J. Culpepper
May 13, 2010
Page 2

of another State, or by Citizens . . . of any Foreign State." (U.S. Const. Amend. 11. (emphasis added).)

As you probably know, this constitutional sovereign immunity applies to and protects not just the state itself, but the state's public university systems. This was made clear by the U.S. Supreme Court when it noted that "the reference to actions 'against one of the United States' encompasses not only actions in which a State is actually named as the defendant, but also certain actions against state agents and state instrumentalities." *Regents of the University of California*, 519 U.S. 429.

Courts have repeatedly held that state universities and their employees are state instrumentalities entitled to immunity under the Eleventh Amendment, and thus fall outside of the reach of federal jurisdiction. *Id.* at 431 (reversing the 9th Cir., and holding that the *University of California* was immune from a breach of contract claim in federal court under the Eleventh Amendment); *Thompson v. City of Los Angeles*, 885 F.2d 1439, 1442-1443 (9th Cir. 1989) (holding that UCLA was an instrumentality of the state for Eleventh Amendment purposes, and thus plaintiff's 1983 claim against the university was properly dismissed on sovereign immunity grounds); *Lewis v. Midwestern State University*, 837 F.2d 197, 199 (5th Cir. 1988) (upholding the district court's dismissal of an action on the basis that the university was entitled to immunity under the Eleventh Amendment).

In fact, lest there be any doubt about this, the Seventh Circuit has specifically determined that *the University of Illinois* is an instrumentality of the state of Illinois, and thus is entitled to the protections of the Eleventh Amendment. *See, e.g., Cannon v. University of Health Sciences/The Chicago Medical School*, 710 F.2d 351, 356-357 (7th Cir. 1983).

In short, plaintiff simply cannot maintain this action against the University of Illinois, an instrumentality of the state, under the express provisions of the Eleventh Amendment and controlling authority interpreting that amendment.

We are aware of no exceptions to this straightforward constitutional bar to the claims you have asserted on behalf of your client against the University of Illinois in this action. Nor is there any discretion vested in the federal court. In the face of a motion to dismiss, it must dismiss the action as against the state instrumentality.

Thaddeus J. Culpepper
May 13, 2010
Page 3

It is for this reason that we believe that you and your client would be subject to monetary sanctions if your client refuses to immediately dismiss the University from this action.

With respect to sanctions, we draw your attention to the Rule 11 standard as expressed by our trial judge, Hon. Gary Klausner, in a recent case:

“Sanctions under Rule 11 of the Federal Rules of Civil Procedure are intended to streamline litigation, *deter baseless filings*, and prevent abusive or dilatory tactics. (Citation.) Pursuant to Rule 11, the Court may impose sanctions when a pleading, motion, or other paper *is either frivolous such that it is not warranted by existing law*, or is filed for an ‘improper purpose.’ (Citations.) *Sanctionable conduct includes filing complaints that are known to be lacking in subject matter jurisdiction*, as well as repeatedly filing lawsuits that assert claims previously dismissed in other cases.”

Barahona v. Orkin, 2008 U.S. Dist. LEXIS 89494 (USDC CD CA 2008) (Klausner) (emphasis added).

Moreover, Judge Klausner is not reluctant to issue sanctions in appropriate cases, as confirmed in *Thelma v. Spirtos*, 2006 U.S. App. LEXIS 5259 (9th Cir. 2006) (affirming Judge Klausner’s issuance of Rule 11 Sanctions).

Federal courts have not hesitated to impose sanctions *on counsel as well* where a plaintiff brings an action against a party that is otherwise immune from suit under the Eleventh Amendment. Please take a look at *Hernandez v. Joliet Police Department*, 197 F.3d 256 (7th Cir. 1999) where the court imposed Rule 11 sanctions against the *plaintiff’s attorney* when he refused to dismiss an instrumentality of the state that was protected from suit by the Eleventh Amendment. Along the same lines, take a look at *Nicarry v. Cannaday*, 2006 U.S. Dist. Lexis 95074 (USDC MD FL 2006) (sanctions against plaintiff were appropriate where “a reasonable inquiry by Plaintiff’s counsel would have revealed that his claim against the Department was objectively frivolous as it was barred by the Eleventh Amendment.... Because Plaintiff’s attorney failed to make a reasonable inquiry into the fairly straightforward and well-established legal issues surrounding this case, Rule 11 sanctions are appropriate.”)

Thaddeus J. Culpepper
May 13, 2010
Page 4

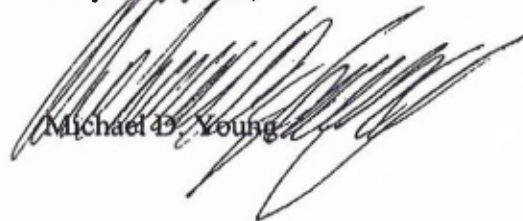
Sanctions have also been imposed against plaintiff's counsel under 28 U.S.C. Section 1927. See, for instance, the Second Circuit's decision in *Gollomp v. Spitzer*, 568 F.3d 355 (2nd Cir. 2009) where the Court affirmed the imposition of sanctions against plaintiff's attorneys Section 1927, for wrongfully prosecuting an action against a state and its officials in federal court in violation of the sovereign immunity provision of the Eleventh Amendment. In that case, the plaintiff filed a 61 page complaint with 493 numbered paragraphs (yours weighs in at 64 pages, but only a mere 211 numbered paragraphs). Granted, the facts in that case were a bit more egregious than what we have seen so far in this case, the point is still well taken – sanctions can be imposed against the client or counsel for persisting in asserting claims clearly barred by sovereign immunity, especially where “defendants [as we are doing here] promptly warned plaintiff's counsel that they intended to file a Rule 11 motion if the causes of action barred by the Eleventh Amendment were not withdrawn,” and where the claims “are incomprehensible – legally or otherwise.” *Id.* at 371. (Without going into it here, we believe the claims you have asserted on behalf of your client will fit this description.)

In short, for the reasons set forth above, we ask that your client immediately dismiss all claims against the University. The University should not have been sued in the first place, and it clearly should not be forced to incur the legal fees to file a motion to dismiss.

Should you choose to decline our request, we will bring a motion to dismiss, and will seek both Rule 11 and Section 1927 sanctions against both your client and the Culpepper Law Groupe.

I would be pleased to discuss this with you further if you would like. You can call me at the number on the letterhead. Otherwise, I look forward to your response to our request by May 17.

Very truly yours,



Michael D. Young

MDY/lo

ADMIN/20618343v2

EXHIBIT C

Olagues, Laura

From: Young, Mike
Sent: Thursday, May 20, 2010 2:04 PM
To: 'culpepper@alumni.pitt.edu'; 'thaddeusfsc@gmail.com'
Cc: Rivas, Nicole
Subject: St. Luke School of Medicine v. Republic of Liberia

Thaddeus, I left you a voicemail message regarding my letter to you of seeking dismissal of the University of Illinois on sovereign immunity grounds. For your convenience, another copy is attached.

Could you please let me know whether you will voluntarily dismiss the University at this time? We will need to prepare our motion to dismiss and for sanctions soon if we don't hear from you, and this seems like an unnecessary expense given the clear impropriety of adding the University to this federal action.

Please get back to me today if at all possible.

Regards,

-MIKE-

Michael D. Young

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Office: (213) 576-1000
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EXHIBIT D

St. Luke School of Medicine et al. v. University of Illinois

Page 1 of 1

Olaques, Laura

From: Rivas, Nicole
Sent: Wednesday, May 26, 2010 3:00 PM
To: thaddeusfsc@gmail.com; culpepper@alumni.pitt.edu
Cc: Young, Mike
Subject: St. Luke School of Medicine et al. v. University of Illinois

Dear Mr. Culpepper:

Our firm has tried repeatedly to reach you by letter, e-mail and telephone, without success, to discuss the voluntary dismissal of the University of Illinois from the above-entitled action. As indicated in our prior correspondence, the case law on this point is crystal clear: the University of Illinois, as an agent of the State of Illinois, may not be sued in federal court for the types of claims that your clients have asserted. Accordingly, such action is completely baseless, and should be dismissed. If you have any authority to the contrary, please provide it to us as soon as possible for our consideration.

If you continue to refuse to dismiss this action, absent some authority to support your position, we will move both to dismiss the action as well as for sanctions against you and your clients under Rule 11. We sincerely hope that such course of action will not be necessary and that you will see the wisdom of dismissing this action without the need for further litigation.

Nicole C. Rivas

Alston & Bird LLP
333 S. Hope, 16th Floor
Los Angeles, California 90071
nicole.rivas@alston.com
213 576-1021
213 576-1100 fax

6/1/2010

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EXHIBIT E

From: Thaddeus J. Culpepper [thaddeusfsc@gmail.com]
Sent: Tuesday, June 01, 2010 3:53 PM
To: Young, Mike
Subject: Re: St. Luke School of Medicine v. Republic of Liberia

We will be voluntarily dismissing

On Thu, May 20, 2010 at 2:03 PM, <Mike.Young@alston.com> wrote:

Thaddeus, I left you a voicemail message regarding my letter to you of seeking dismissal of the University of Illinois on sovereign immunity grounds. For your convenience, another copy is attached.

Could you please let me know whether you will voluntarily dismiss the University at this time? We will need to prepare our motion to dismiss and for sanctions soon if we don't hear from you, and this seems like an unnecessary expense given the clear impropriety of adding the University to this federal action.

Please get back to me today if at all possible.

Regards,

-MIKE-

Michael D. Young

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6/22/2010

21

EXHIBIT F

From: Young, Mike
Sent: Thursday, June 10, 2010 10:44 AM
To: 'thaddeusfsc@gmail.com'; 'culpepper@alumni.pitt.edu'
Subject: RE: St. Luke School of Medicine v. Republic of Liberia

Thaddeus: Per my voicemail message to you this morning, please give me a call to discuss this case. I appreciate that you are now agreeing to dismiss the University of Illinois from the action -- I wish you would have done so pursuant to my earlier requests and prior to our having to file the motion to dismiss as then we would have agreed to waive costs and sanctions. Nonetheless, better late than never. Please let me know when we can expect to see the dismissal. In the meantime, I assume you do not mind if we notify the court that you will not be opposing our motion.

In my voicemail message, I also asked that you dismiss Dr. Gollin from the action. Accepting your allegations in the complaint that Dr. Gollin was acting in his role as an employee of the University, he too would be covered by the sovereign immunity of the Eleventh Amendment. We can provide you with legal authority if you would like, but I have no doubt that by this time you are fully aware of the scope of Eleventh Amendment immunity.

Could you please respond by either a phone call or email and let me know that you will dismiss Dr. Gollin from this action? I would like to have your response by Monday so we can avoid preparing yet another motion to dismiss.

I look forward to your prompt reply. Regards,

-MIKE-

Michael D. Young
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From: Thaddeus J. Culpepper [mailto:thaddeusfsc@gmail.com]
Sent: Tuesday, June 01, 2010 3:53 PM
To: Young, Mike
Subject: Re: St. Luke School of Medicine v. Republic of Liberia

We will be voluntarily dismissing

On Thu, May 20, 2010 at 2:03 PM, <Mike.Young@alston.com> wrote:

Thaddeus, I left you a voicemail message regarding my letter to you of seeking dismissal of the University of Illinois on sovereign immunity grounds. For your convenience, another copy is attached.

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6/22/2010

23

prepare our motion to dismiss and for sanctions soon if we don't hear from you, and this seems like an unnecessary expense given the clear impropriety of adding the University to this federal action.

Please get back to me today if at all possible.

Regards,

-MIKE-

Michael D. Young

Alston + Bird

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6/22/2010

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EXHIBIT G

JS-6

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	CV 10-01791 RGK (SHx)	Date	July 29, 2010
Title	<i>St. Luke School of Medicine, et al. v. Republic of Liberia, et al.</i>		

Present: The Honorable	R. GARY KLAUSNER, U.S. DISTRICT JUDGE
------------------------	---------------------------------------

Sharon L. Williams

Not Reported

Deputy Clerk

Court Reporter / Recorder

Attorneys Present for Plaintiffs:

Attorneys Present for Defendants:

Not Present

Not Present

Proceedings: (IN CHAMBERS) Order re: Order Dismissing Complaint for Failure to Establish Subject Matter Jurisdiction.

Plaintiff has failed to properly respond to the Court's Order to Show Cause why this case should not be dismissed for lack of subject matter jurisdiction. Plaintiff's attorney failed to file any response to the Order to Show Cause. Plaintiff filed a document himself; yet since Plaintiff is not counsel of record, the document was rejected. In any event, Plaintiff's filings would not have saved the case from being dismissed. Plaintiff's arguments regarding federal subject matter jurisdiction are without merit. And Plaintiff's argument based on diversity is based on the mistaken notion that country of citizenship (in contrast to the State where domestic parties reside) is taken into account for diversity jurisdiction analysis. In particular, Plaintiff has not clarified the state of citizenship for parties that are United States citizens (on either side).

Since Plaintiff has failed to properly respond to the Court's Order to Show Cause, and since Plaintiff's arguments do not establish subject matter jurisdiction, the Court **DISMISSES** this action in its entirety for lack of subject matter jurisdiction.

IT IS SO ORDERED.

Initials of Preparer slw

EXHIBIT H

POSTAGE

UPS

Filter Data By:

Field	Relation	Value
File Batch	=	05_15_2010.csv
Matter	=	030000
Select a Field	=	

☒ And ☐ Or
☒ And ☐ Or

Filter

Tracking Number 128FV4041341032713		References 009990-030000 Michael Young - 057270-389467		Matter 030000 Personal <input type="checkbox"/> Error No Errors Status Ready for Export	
Pickup Date 5/14/2010 ItemID 618536		Shipper Number LAX - 00008FV404			
Sender: CHRIS G LARES			Receiver: Thaddeus J. Culpeppe Culpepper Law Groupe 556 South Fair Oaks Avenue Pasadena CA 91105 US		
Quantity	1	Trans Code	Manifest	FileID	485
Billed Weight	LTR	Service Desc	COM. NEXT DAY AIR SAVER	Early AM	<input type="checkbox"/>
ActualWeight		BillOption	1	Dimensional Wt	<input type="checkbox"/>
Weight Indicator		NetCharges	7.17	OverSize1	<input type="checkbox"/>
UPSZone	132	Incentive	8.02	OverSize2	<input type="checkbox"/>
				Saturday Pickup	<input type="checkbox"/>
				Ext Dest Charge	<input type="checkbox"/>
				Invalid Account	<input type="checkbox"/>

Return to Main Menu

COPYING CHARGES

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PRECOST TABLE REPORT

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Control Group	Matter Number	Cost Code	Transaction Date	Counter	Tkeep	Quantity	Rate	Amount	Ledger Code	Loc	Valid Flag	Posting Batch	Date Modified	Mod. Optr.
00020488	389467	006	052710	23774909	YOUND	3.00	0.11	0.33	COST	08	P	627276		
			DESCRIPTION: Document Production Charges Unit LAXLASER User RIVAN											
00020504	389467	006	052810	23781551	YOUND	6.00	0.11	0.66	COST	08	P	627404		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
00020555	389467	006	060110	23795649	YOUND	17.00	0.11	1.87	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User RIVAN											
			060110	23797058	YOUND	20.00	0.11	2.20	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User RIVAN											
			060110	23797868	YOUND	3.00	0.11	0.33	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23797883	YOUND	3.00	0.11	0.33	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23797919	YOUND	13.00	0.11	1.43	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23797939	YOUND	4.00	0.11	0.44	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23797950	YOUND	3.00	0.11	0.33	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23797974	YOUND	1.00	0.11	0.11	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23798339	YOUND	17.00	0.11	1.87	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User RIVAN											
			060110	23798037	YOUND	2.00	0.11	0.22	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23798045	YOUND	17.00	0.11	1.87	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23798210	YOUND	17.00	0.11	1.87	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23797312	YOUND	1.00	0.11	0.11	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL											
			060110	23797448	YOUND	6.00	0.11	0.66	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User RIVAN											
			060110	23797555	YOUND	7.00	0.11	0.77	COST	08	P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User RIVAN											

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PRECOST TABLE REPORT

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Control Group	Matter Number	Cost Code	Transaction Date	Counter	Keep	Quantity	Rate	Amount	Ledger Code	Loc Valid Flag	Posting Batch	Date Modified	Mod. Optr.
00020555	389467	006	060110	23797650	YOUND	3.00	0.11	0.33	COST	08 P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL										
			060110	23797758	YOUND	4.00	0.11	0.44	COST	08 P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL										
			060110	23797794	YOUND	4.00	0.11	0.44	COST	08 P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL										
			060110	23797806	YOUND	3.00	0.11	0.33	COST	08 P	627898		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL										
		GROUP 20555 TOTAL:					145.00	15.95					
00020561	389467	157	060110	23801632	YOUND	3.00	0.11	0.33	COST	08 P	627906		
			DESCRIPTION: Document Production Charges Unit ATLACUSC User OLAGL										
			060110	23801634	YOUND	17.00	0.11	1.87	COST	08 P	627906		
			DESCRIPTION: Document Production Charges Unit ATLACUSC User OLAGL										
			060110	23801678	YOUND	3.00	0.11	0.33	COST	08 P	627906		
			DESCRIPTION: Document Production Charges Unit ATLACUSC User OLAGL										
			060110	23801700	YOUND	16.00	0.11	1.76	COST	08 P	627906		
			DESCRIPTION: Document Production Charges Unit ATLACUSC User OLAGL										
			060110	23801702	YOUND	2.00	0.11	0.22	COST	08 P	627906		
			DESCRIPTION: Document Production Charges Unit ATLACUSC User OLAGL										
		GROUP 20561 TOTAL:					41.00	4.51					
00020601	389467	004	061010	23813505	YOUND	1.00	0.11	0.11	COST	08 P	628278		
			DESCRIPTION: Document Production Charges Unit LAX15SCB User RIVAN										
00020693	389467	004	062210	23849319	YOUND	6.00	0.11	0.66	COST	08 P	628883		
			DESCRIPTION: Document Production Charges Unit LAX17CCA User MORRIS										
00020695	389467	006	062210	23852255	YOUND	3.00	0.11	0.33	COST	08 P	628886		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL										
			062210	23852290	YOUND	3.00	0.11	0.33	COST	08 P	628886		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL										
			062210	23852318	YOUND	3.00	0.11	0.33	COST	08 P	628886		
			DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL										
			062210	23852365	YOUND	14.00	0.11	1.54	COST	08 P	628886		
			DESCRIPTION: Document Production Charges Unit LAXLASER User BOWIC										
			062210	23852371	YOUND	1.00	0.11	0.11	COST	08 P	628886		
			DESCRIPTION: Document Production Charges										

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Control Group	Matter Number	Cost Code	Transaction Date	Counter	Tkeep	Quantity	Rate	Amount	Ledger Code	Loc	Valid Flag	Posting Batch	Date Modified	Mod. Optr.
00020695	389467	006	062210	23852373	YOUND	1.00	0.11	0.11	COST	08	P	628886		
			Unit LAXLASER User BOWIC DESCRIPTION: Document Production Charges											
			062210	23852391	YOUND	14.00	0.11	1.54	COST	08	P	628886		
			Unit LAXLASER User BOWIC DESCRIPTION: Document Production Charges											
			062210	23852395	YOUND	14.00	0.11	1.54	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852409	YOUND	1.00	0.11	0.11	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852434	YOUND	3.00	0.11	0.33	COST	08	P	628886		
			Unit LAXLASER User BOWIC DESCRIPTION: Document Production Charges											
			062210	23852465	YOUND	17.00	0.11	1.87	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852472	YOUND	2.00	0.11	0.22	COST	08	P	628886		
			Unit LAXLASER User MORER DESCRIPTION: Document Production Charges											
			062210	23852476	YOUND	17.00	0.11	1.87	COST	08	P	628886		
			Unit LAXLASER User BOWIC DESCRIPTION: Document Production Charges											
			062210	23852478	YOUND	2.00	0.11	0.22	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852480	YOUND	1.00	0.11	0.11	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852482	YOUND	1.00	0.11	0.11	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852488	YOUND	1.00	0.11	0.11	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852502	YOUND	17.00	0.11	1.87	COST	08	P	628886		
			Unit LAXLASER User BOWIC DESCRIPTION: Document Production Charges											
			062210	23852518	YOUND	17.00	0.11	1.87	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852520	YOUND	1.00	0.11	0.11	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852525	YOUND	1.00	0.11	0.11	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852529	YOUND	2.00	0.11	0.22	COST	08	P	628886		
			Unit LAXLASER User OLAGL DESCRIPTION: Document Production Charges											
			062210	23852561	YOUND	1.00	0.11	0.11	COST	08	P	628886		

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Control Group	Matter Number	Cost Code	Transaction Date	Counter	Tkeep	Quantity	Rate	Amount	Ledger Code	Loc Valid Flag	Posting Batch	Date Modified	Mod. Optr.
00020695	389467	006	062210	23852567	YOUND	17.00	0.11	1.87	COST	08 P	628886		
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23852571	YOUND	3.00	0.11	0.33	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23852581	YOUND	1.00	0.11	0.11	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23852592	YOUND	1.00	0.11	0.11	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23852603	YOUND	1.00	0.11	0.11	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23852605	YOUND	17.00	0.11	1.87	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User MOYAL													
062210	23852808	YOUND	2.00	0.11	0.22	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User MORRIS													
062210	23852815	YOUND	1.00	0.11	0.11	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23852817	YOUND	3.00	0.11	0.33	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23850581	YOUND	3.00	0.11	0.33	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23850597	YOUND	3.00	0.11	0.33	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23850636	YOUND	3.00	0.11	0.33	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
062210	23851470	YOUND	2.00	0.11	0.22	COST	08 P	628886					
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL													
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062210	23854178	YOUND	3.00	0.11	0.33	COST	08 P	628888					
DESCRIPTION: Document Production Charges Unit ATLACUSC User OLAGL													
062210	23854195	YOUND	3.00	0.11	0.33	COST	08 P	628888					
DESCRIPTION: Document Production Charges Unit ATLACUSC User OLAGL													
062210	23854197	YOUND	8.00	0.11	0.88	COST	08 P	628888					

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PRECOST TABLE REPORT

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Control	Cost	Transaction	Ledger	Loc	Valid	Posting	Date	Mod.						
Group	Matter	Number	Code	Date	Counter	Tkeep	Quantity	Rate	Amount	Code	Flag	Batch	Modified	Optr.
			DESCRIPTION: Document Production Charges											
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00020697	389467	157	062210	23854210	YOUND		35.00	0.11	3.85	COST	08	P	628888	
			DESCRIPTION: Document Production Charges											
			Unit ATLACUSC User OLAGL											
			062210	23854274	YOUND		17.00	0.11	1.87	COST	08	P	628888	
			DESCRIPTION: Document Production Charges											
			Unit ATLACUSC User OLAGL											
			062210	23854275	YOUND		3.00	0.11	0.33	COST	08	P	628888	
			DESCRIPTION: Document Production Charges											
			Unit ATLACUSC User OLAGL											
			062210	23854276	YOUND		2.00	0.11	0.22	COST	08	P	628888	
			DESCRIPTION: Document Production Charges											
			Unit ATLACUSC User OLAGL											
		GROUP 20697 TOTAL:					77.00		8.47					
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			DESCRIPTION: Document Production Charges											
			Unit LAXI5SCB User OLAGL											
00020703	389467	006	062310	23856043	YOUND		5.00	0.11	0.66	COST	08	P	628943	
			DESCRIPTION: Document Production Charges											
			Unit LAXLASER User OLAGL											
00020704	389467	157	062310	23855592	YOUND		6.00	0.11	0.66	COST	08	P	628944	
			DESCRIPTION: Document Production Charges											
			Unit ATLACUSC User OLAGL											
00020739	389467	006	062910	23869929	YOUND		4.00	0.11	0.44	COST	08	P	629217	
			DESCRIPTION: Document Production Charges											
			Unit LAXLASER User S0319											
			062910	23870517	YOUND		5.00	0.11	0.55	COST	08	P	629217	
			DESCRIPTION: Document Production Charges											
			Unit LAXLASER User S0319											
		GROUP 20739 TOTAL:					9.00		0.99					
00020746	389467	006	063010	23874236	YOUND		5.00	0.11	0.55	COST	08	P	629312	
			DESCRIPTION: Document Production Charges											
			Unit LAXLASER User S0319											
			063010	23874365	YOUND		5.00	0.11	0.55	COST	08	P	629312	
			DESCRIPTION: Document Production Charges											
			Unit LAXLASER User S0319											
			063010	23874404	YOUND		5.00	0.11	0.55	COST	08	P	629312	
			DESCRIPTION: Document Production Charges											
			Unit LAXLASER User S0319											
			063010	23874487	YOUND		5.00	0.11	0.55	COST	08	P	629312	
			DESCRIPTION: Document Production Charges											
			Unit LAXLASER User S0319											
			063010	23874525	YOUND		5.00	0.11	0.55	COST	08	P	629312	
			DESCRIPTION: Document Production Charges											
			Unit LAXLASER User S0319											
		GROUP 20746 TOTAL:					25.00		2.75					

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Control Group	Matter Number	Cost Code	Transaction Date	Counter	Tkeep	Quantity	Rate	Amount	Ledger Code	Loc	Valid Flag	Posting Batch	Date Modified	Mod. Optr.
00020780	389467	006	070110	23883683	YOUND	1.00	0.11	0.11	COST	08	P	629648		
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL														
00020794	389467	004	070610	23889115	YOUND	4.00	0.11	0.44	COST	08	P	629710		
DESCRIPTION: Document Production Charges Unit LAX17SCB User RIVAN														
00020851	389467	004	070910	23896751	YOUND	2.00	0.11	0.22	COST	08	P	630459		
DESCRIPTION: Document Production Charges Unit LAX17CCA User RIVAN														
00020864	389467	006	071210	23905838	YOUND	1.00	0.11	0.11	COST	08	P	630473		
DESCRIPTION: Document Production Charges Unit LAXLASER User CUGLR														
			071210	23904865	YOUND	1.00	0.11	0.11	COST	08	P	630473		
DESCRIPTION: Document Production Charges Unit LAXLASER User CUGLR														
			071210	23911481	YOUND	4.00	0.11	0.44	COST	08	P	630473		
DESCRIPTION: Document Production Charges Unit LAXLASER User OLAGL														
GROUP 20864 TOTAL:						6.00		0.66						
00020906	389467	004	072110	23923156	YOUND	30.00	0.11	3.30	COST	08	P	630724		
DESCRIPTION: Document Production Charges Unit LAX17CCB User CUGLR														
00021000	389467	004	073010	23964795	YOUND	4.00	0.11	0.44	COST	08	P	631269		
DESCRIPTION: Document Production Charges Unit LAX17SCB User RIVAN														
GRAND TOTAL:						567.00		62.37						

TOTAL VALID ENTRIES :		.00
INVALID ENTRIES :		.00
ENTRIES POSTED :	90	62.37
FIRM ENTRIES :		.00
<hr/>		
TOTAL:	90	62.37

COMPUTER RESEARCH

39

Case	Service	1	N	12.5	-9.49	3.01	0	0	0	3.01	0	0	70.00%	\$6.75	\$3.75	0	\$0.00	\$3.75	\$0.00
6/1/2010 309467-RVAN	LEXIS, NIDDLE																		\$0.00
6/1/2010 309467-RVAN	RIVAS, NIDDLE	8652	T	0	0	0	0	0	0	0	0	0	70.00%	\$0.00	\$0.00	0	\$0.00	\$0.00	\$0.00
6/1/2010 309467-RVAN	LEXIS, NIDDLE	3	N	265	-201.33	63.67	0	0	0	63.67	0	0	70.00%	\$183.50	\$79.50	0	\$0.00	\$79.50	\$0.00
6/1/2010 309467-RVAN	RIVAS, NIDDLE	6	N	75	-56.97	18.03	0	0	0	18.03	0	0	18.03	\$52.50	\$22.50	0	\$0.00	\$22.50	\$0.00

[illegible]

✓	\$15.00
	\$0.00
✓	\$11.25
✓	\$33.75
	\$0.00
✓	\$42.50
✓	\$87.50
✓	\$2.18
	\$0.00

QuickView - Report

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WESTMAN

Client: 339267
User Name: CARLSON, LINDSAY (#039551)
Day: 08/03/2010
Totals for Invoiced:
Totals for Day 08/03/2010
Totals for User Name: CARLSON, LINDSAY (#039551)
Totals for Client: 339267

025.47
025.47
025.47

11
11
11

0.25.47
0.25.47
0.25.47

\$754.31
\$754.31
\$754.31

\$75.43
\$75.43
\$75.43

\$0.00
\$0.00
\$0.00

\$75.43
\$75.43
\$75.43



<https://www.quickview.com/Reports/UsageReportPrintable.aspx>

6/7/2010

Totals for Included
Totals for Day 05/23/2010
Totals for User Name READHEAD,CLAIRE (7346452)
Totals for Client 319467

Totals for included
Totals for Day 06/28/2010
Totals for User Name READ
Totals for Client 39467

1:25:09
1:25:09
1:25:09
1:25:09

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\$1,388.26
\$1,388.26
\$1,388.26
\$1,388.26

50.00	50.00	50.00	50.00
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\$138.83
\$138.83
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<https://www.quickview.com/Reports/UsageReportPrintable.aspx>

6/29/2010

Quickview - Report

Page 8 of 99

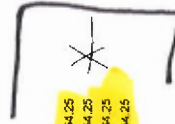
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 User Name: READHEAD, CLAIRE (7346452)
 Day: 06/29/2010
 Totals for Included
 Totals for Day: 06/29/2010
 Totals for User Name: READHEAD, CLAIRE (7346452)
 Totals for Client: 38467

2:32:10
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2:32:10 \$1,542.48
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 2:32:10 \$1,542.49
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<https://www.quickview.com/Reports/UsageReportPrintable.aspx>

7/6/2010

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COURT SERVICES	Provide one extra copy to conform.	
FIRM and CASE INFORMATION	FIRM: #10367 ALSTON & BIRD LLP 333 S. HOPE ST., 16TH FLR LOS ANGELES, CA 90071 213-576-1000 ATTY/SECTY: <u>Laura Olagues</u> EXT. _____ YOUR FILE NO.: <u>057270-389467</u>	DATE: <u>6-23-10</u> COURT: <u>USDC - Central</u> CASE NO.: <u>10-CV-01791 RGK (SHx)</u> CASE NAME: <u>St. Luke v. Republic of Liberia</u> DOCUMENTS: <u>Reply & Declaration</u> <u>Motion To Dismiss & Supporting Pleadings</u> <u>Total of 7 pleadings</u>
CRITICAL DATES	LAST DAY TO FILE _____ EXPEDITE & RETURN BY _____ HEARING SET FOR _____ AT _____ DEPT/DIV. _____	
FEES	FEE \$ _____ <input type="checkbox"/> ATTACHED <input type="checkbox"/> ADVANCE DEFENDANT/RESPONDENT APPEARANCE FEE PAID? ____ YES ____ NO DATE PAID: _____	
SERVICE REQUESTED	<input type="checkbox"/> EXCLUSIVE <input checked="" type="checkbox"/> SAME DAY <input type="checkbox"/> NEXT DAY <input type="checkbox"/> DAILY RUN <input type="checkbox"/> FILING <input type="checkbox"/> FILE & CONFORM <input checked="" type="checkbox"/> COURTESY COPY <input type="checkbox"/> SASE ATTACHED <input type="checkbox"/> RESEARCH	
SPECIAL INSTRUCTIONS	Please deliver courtesy copies of the attached pleadings to Judge Klausner by noon. Thank you.	

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STATUS REPORT	BASE CHARGE	50.75
	RESEARCH	
	RETURN	
	WAITING TIME	
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	FACSIMILE	
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COURT SERVICES	Provide one extra copy to conform.	
FIRM and CASE INFORMATION	FIRM: #10367 ALSTON & BIRD LLP 333 S. HOPE ST., 16TH FLR LOS ANGELES, CA 90071 213-576-1000 ATTY/SECTY: Laura Olagues EXT. 1151 YOUR FILE NO.: 057270-389467	DATE: 6-2-10 COURT: USDC - Central - Roybal CASE NO.: 10-CV-01791 RGK (SHx) CASE NAME: St. Luke v. Republic of Liberia DOCUMENTS: <u>Notice of Motion to Dismiss; MDY Declaration;</u> <u>P&As; Proposed Order; Certificate of Interested Parties</u>
CRITICAL DATES	LAST DAY TO FILE _____ EXPEDITE & RETURN BY _____ HEARING SET FOR _____ AT _____ DEPT/DIV. _____	
FEES	FEE \$ _____ <input type="checkbox"/> ATTACHED <input type="checkbox"/> ADVANCE DEFENDANT/RESPONDENT APPEARANCE FEE PAID? YES <input type="checkbox"/> NO <input type="checkbox"/> DATE PAID: _____	
SERVICE REQUESTED	<input type="checkbox"/> EXCLUSIVE <input checked="" type="checkbox"/> SAME DAY <input type="checkbox"/> NEXT DAY <input type="checkbox"/> DAILY RUN <input type="checkbox"/> FILING <input type="checkbox"/> FILE & CONFORM <input checked="" type="checkbox"/> COURTESY COPY <input type="checkbox"/> CASE ATTACHED <input type="checkbox"/> RESEARCH	
SPECIAL INSTRUCTIONS	Please deliver the attached courtesy copies to Judge Klausner by noon today. Thank you.	

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STATUS REPORT	BASE CHARGE	52.75
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	RETURN	
	WAITING TIME	
	ADVANCE FEES	
	CHECK CHARGE	
	FACSIMILE	
		TOTAL

ACE (1) _____ ACE (2) _____ ACE CHECK # _____ AMOUNT \$ _____

EXHIBIT I

Young, Mike

From: Rivas, Nicole
Sent: Wednesday, August 11, 2010 2:53 PM
To: thaddeusfsc@gmail.com; culpepper@alumni.pitt.edu
Cc: Young, Mike
Subject: St. Luke Medical School

Dear Mr. Culpepper:

This e-mail is to follow-up the two voicemail messages I left for you last week and earlier today. As required by Local Rule 7-3, we would like to meet and confer with you regarding our proposed motions for costs under 28 U.S.C. § 1919 and for sanctions under 28 U.S.C. § 1927 and the Court's inherent power. Please contact me by no later than the end of the day if you desire to attempt to informally resolve this matter without having to involve the Court.

Nicole C. Rivas

Alston & Bird LLP
333 S. Hope, 16th Floor
Los Angeles, California 90071
nicole.rivas@alston.com
213 576-1021
213 576-1100 fax